

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

ORDER

AND NOW, this day of , 2025, it is hereby ORDERED that Defendant's Motion To Continue Sentencing for 90 days, in the above captioned matter, is hereby GRANTED.

BY THE COURT:

J.

R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
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Jenkintown, PA 19046
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**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

V. : CRIMINAL NO: 2:24-cr-00263-MAK

DONALD MICHAEL :

**DEFENDANT, DONALD MICHAEL'S
MOTION TO CONTINUE SENTENCING FOR 90 DAYS**

TO THE HONORABLE JUDGE MARK A. KEARNEY:

AND NOW, Defendant, Donald Michael, by and through his attorney,
R. Emmett Madden, Esquire, hereby submits this Motion to Continue Sentencing for 90 days and
avers the following:

1. On July 18, 2024, the government sealed a 4-count Indictment charging
Defendant Donald Michael with Conspiracy to Manufacture Child Pornography and other related
charges.
2. Mr. Michael is charged in that Indictment with the following: Count One
Conspiracy to Manufacture Child Pornography, Conspiracy to Receive and Distribute Child
Pornography, Receipt of Child Pornography and Distribution and Attempted Distribution of

Child Pornography.

3. On August 27, 2024, R. Emmett Madden, Esquire entered his appearance to represent Mr. Michael.

4. Sentencing is currently scheduled for August 14, 2025, at 9:00 A.M., in Courtroom 6B, United States Courthouse, 601 Market Street, in Philadelphia Pennsylvania.

5. Pursuant to this Court's Order, Defendant was transported to FCI Butner, North Carolina for a Forensic Psychological Evaluation by Justin Rigsbee, Ph.D., Psy.D., Forensic Psychologist.

6. Defendant only recently returned to FDC Philadelphia.

7. Counsel has also retained an expert, at Defendant's own expense, to perform a forensic evaluation.

8. Counsel is scheduling this evaluation now that Defendant has returned to FDC Philadelphia.

9. Defendant is requesting Sentencing be continued for 90 days to complete this evaluation, complete a Presentencing Memo and provide both to the Court and the Government prior to Sentencing.

10. Counsel is requesting to continue Sentencing for 90 days.

11. Defendant acknowledges and waives his speeding trial rights.

12. Assistant United States Attorney is unopposed to the extension request.

WHEREFORE, Defendant respectfully requests the Motion to Continue Sentencing be Granted.

Date: 7/29/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
Attorney for Defendant

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CERTIFICATE OF SERVICE

I, R. Emmett Madden, Esquire, hereby certify that, on this date, I have served a copy of the attached Defendant's Motion To Continue Sentencing for 90 days, upon the following by electronic mail:

The Honorable Mark A. Kearney
United States District Court
Eastern District Court of Pennsylvania
6613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Via Email

AUSA Kelly Harrell
AUSA Michelle Rotella
United States Attorney's Office
615 Chestnut Street
Suite 1250
Philadelphia, PA 19106
Via Email

Date: 07/29/2025

Respectfully submitted by:

/S/ R. EMMETT MADDEN, ESQUIRE
R. EMMETT MADDEN, ESQUIRE
THE PHILLY LAWYERS
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Attorney for Defendant